

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

Christine Borden,

Plaintiff,

Vs.

Bank of America, NA (“BANA”), Westcliff Technologies, Inc. d/b/a National Bitcoin ATM and Cash Cloud, Inc. d/b/a Coin Cloud,

Defendants.

Civil Action No. 2:22-cv-04076-BHH

MOTION FOR EXTENSION OF TIME TO  
RESPOND AND/OR AMEND  
COMPLAINT

Plaintiff Christine Borden with the consent of Defendant Bank of America, N.A. hereby moves for a Fourteen (14) day extension of time until December 21, 2022 to respond to Defendant Bank of America, N.A.’s Motion to Dismiss filed with this Court on November 23, 2022 (Entry Number 4). Additionally ,Plaintiff requests to extend the deadline to Amend the Complaint by Seven (7) days until December 21, 2022. The parties are currently engaged in discussions and hope to resolve this motion without the expense of filing multiple responses.

Pursuant to Local Rule 6.01, Plaintiff Christine Borden would additionally provide the following information:

1. The current deadline for Plaintiff to respond to Defendant Bank of America, N.A.’s Motion to Dismiss (Docket Entry 4) is December 7, 2022.
2. The current deadline for Plaintiff to amend her complaint is December 14, 2022.
3. These deadlines have not been previously extended.

4. The number of additional days requested to respond to Defendant Bank of America, N.A.'s Motion to Dismiss is Fourteen (14) days. The new deadline would be December 21, 2022.
5. The Plaintiff also requests to extend the deadline to amend her complaint by Seven (7) days, making the new deadline to amend the complaint December 21, 2022, as well.
6. The requested changes would not affect other deadlines.

The undersigned certifies that, prior to making this Motion he contacted counsel for Bank of America, N.A. concerning the subject Motion pursuant to rule 7.02. Opposing counsel consents to this Motion.

Respectfully submitted,

s/ Dave Maxfield  
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DATED: November 29, 2022